# **SUPPRESSED**

### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)
Plaintiff,	) CRIMINAL NO. 21-02-40048-5My
vs.	)
	) Title 21, United States Code,
JAYLEN R. VINSON,	Sections 841 and 846
CARLOS L. HALLIBURTON,	)
DEANTE S. JONES,	)
SIQUON D. WHITAKER,	)
SENQUE S. BINGHAM,	)
WILLIAM J. AKES,	FILED
WILLIE L. DENNIS,	
NICHOLAS L. GARLAND,	JUN 0 8 2021
KYREE T. WRIGHT, and	)
WAITH A. E. WILLIAMS,	) CLERK, U.S. DISTRICT COURT
	SOUTHERN DISTRICT OF ILLINOIS BENTON OFFICE
Defendants.	)

#### **INDICTMENT**

#### THE GRAND JURY CHARGES:

#### COUNT 1

#### **Conspiracy To Distribute Methamphetamine**

From on or about February 2021, until on or about May 26, 2021, in Jackson, Williamson, Perry, and Alexander Counties, within the Southern District of Illinois, and elsewhere,

JAYLEN R. VINSON,
CARLOS L. HALLIBURTON,
DEANTE S. JONES,
SIQUON D. WHITAKER,
SENQUE S. BINGHAM,
WILLIAM J. AKES,
WILLIE L. DENNIS,
NICHOLAS L. GARLAND, and
KYREE T. WRIGHT,

defendants herein, did knowingly combine, conspire, and agree with others known and unknown to the Grand Jury, to knowingly and intentionally distribute methamphetamine, Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1); all in violation of Title 21, United States Code, Section 846.

It is further alleged that the total amount of methamphetamine involved in the conspiracy was fifty (50) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(A).

#### **COUNT 2**

#### Distribution of Methamphetamine

On or about March 1, 2021, in Jackson County, within the Southern District of Illinois,

#### JAYLEN R. VINSON,

defendant herein, did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the total amount of methamphetamine involved was fifty (50) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(A).

#### **COUNT 3**

#### Distribution of Methamphetamine

On or about March 9, 2021, in Jackson County, within the Southern District of Illinois,

#### JAYLEN R. VINSON,

defendant herein, did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the total amount of methamphetamine involved was fifty (50) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(A).

#### **COUNT 4**

#### Distribution of Methamphetamine

On or about May 19, 2021, in Perry County, within the Southern District of Illinois,

#### JAYLEN R. VINSON,

defendant herein, did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the total amount of methamphetamine involved was fifty (50) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(A).

#### COUNT 5

#### Distribution of Methamphetamine

On or about May 21, 2021, in Alexander County, within the Southern District of Illinois,

## CARLOS L. HALLIBURTON and WILLIE L. DENNIS,

defendants herein, did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the total amount of methamphetamine involved was fifty (50) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(A).

#### **COUNT 6**

#### Possession with Intent to Distribute Methamphetamine

On or about May 21, 2021, in Alexander County, within the Southern District of Illinois,

#### CARLOS L. HALLIBURTON,

defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the total amount of methamphetamine involved was five (5) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(B).

#### COUNT 7

#### Distribution of Methamphetamine

On or about February 24, 2021, in Jackson County, within the Southern District of Illinois,

#### WILLIAM J. AKES,

defendant herein, did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the total amount of methamphetamine involved was five (5) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(B).

#### **COUNT 8**

#### Possession with Intent to Distribute Methamphetamine

On or about April 5, 2021, in Williamson County, within the Southern District of Illinois,

#### NICHOLAS L. GARLAND,

defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the total amount of methamphetamine involved was five (5) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(B).

#### COUNT 9

#### Possession with Intent to Distribute Methamphetamine

On or about May 13, 2021, in Williamson County, within the Southern District of Illinois,

#### NICHOLAS L. GARLAND,

defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the total amount of methamphetamine involved was fifty (50) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(A).

#### COUNT 10

#### Distribution of Methamphetamine

On or about May 26, 2021, in Jackson County, within the Southern District of Illinois,

#### KYREE T. WRIGHT,

defendant herein, did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the total amount of methamphetamine involved was five (5) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(B).

#### **COUNT 11**

#### Possession with Intent to Distribute Methamphetamine

On or about April 17, 2021, in Jackson County, within the Southern District of Illinois,

#### WAITH A. E. WILLIAMS,

defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the total amount of methamphetamine involved was fifty (50) grams or more of actual methamphetamine, punishable pursuant to the provisions of Title 21, United States Code, Section 841(b)(1)(A).

#### FORFEITURE ALLEGATION

As a result of the foregoing offenses described in Counts 1 - 4,

#### JAYLEN R. VINSON,

defendant herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any and all property used, or intended to be used, in any manner or part, to commit or facilitate the commission of an offense or offenses as a result of the violation alleged in Counts 1 - 4 of this

Indictment, and any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the violation alleged in Counts 1 - 4 of this Indictment. Said property includes, but is not limited to:

One 2015 Yellow Black Corvette Stingray, bearing VIN: 1G1YK2D78F5122108, with all attachments, accessories, and appurtenances thereon.

### FORFEITURE ALLEGATION

As a result of the foregoing offenses described in Counts 1, 5, and 6,

#### CARLOS L. HALLIBURTON,

defendant herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any and all property used, or intended to be used, in any manner or part, to commit or facilitate the commission of an offense or offenses as a result of the violation alleged in Counts 1, 5, and 6 of this Indictment, and any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the violation alleged in Counts 1, 5, and 6 of this Indictment. Said property includes, but is not limited to:

- a. One 2012 Gray Jeep Grand Cherokee, bearing VIN: 1C4RJECT5CC301146, with all attachments, accessories, and appurtenances thereon; and
- b. \$7,020.00 in United States Currency.

FORSTEVEN D. WEINHOEFT

United States Attorney

GEORGE NORWOOD

Assistant United States Attorney

Recommended Bond: Detention as to all Defendants